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The Honorable Jocelyn G. Boyd Chief Clerk and Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

> Re: Docket 2020-106-A. Petition of the Office of Regulatory Staff for Waiver of Commission Regulations and Amendment of Order.

Dear Ms. Boyd:

In accordance with the Commission's Order No. 2020-34-H, I am writing to respond to the petition of the Office of Regulatory Staff filed on April 30, 2020 on behalf of Frontier Communications of the Carolinas LLC ("Frontier"). According to S.C. Code Reg. 103-622.5 a "telephone utility may provide for the arrangement of a deferred payment plan to enable a residential customer to make payment by installments where such customer is unable to pay the amount due for service." The regulation allows the deferred payment plan to last over a period of up to 6 months. Frontier would like the flexibility to offer customers deferred payment plans for periods longer than 6 months under appropriate circumstances and supports ORS's request for an order waiving S.C. Code Reg. 103-622.5. However, Frontier would not support telephone utilities being required to offer deferred payment plans with terms longer than 6 months. Frontier believes deferred payment plans should remain an option available to utilities when they work with customers unable to pay their bills.

- G. Willer

Sincerely,

Nanette S. Edwards, Esq. c: Carri Grube Lybarker, Esq. Counsel of Record